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BY ECF

Hon. Lorna Schofield
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Magnum Photos, Inc. v. Future US, Inc., Case No. 1:22-cv-7985

Dear Judge Schofield:

On behalf of defendant Future US, Inc., d/b/a Cinema Blend ("Future US"), I write pursuant to Rule 1(B)(2) of this Court's individual rules of practice to respectfully request a thirty-day extension, to and including December 19, 2022, to answer or otherwise respond to the Complaint in the above-referenced litigation. Future US's response is currently due November 17. Through counsel, the parties have exchanged settlement proposals, as recently as yesterday. Accordingly, a brief adjournment is requested so that counsel may further explore a potential resolution of this matter. This is Future US's second request for an extension of its time to respond.

We have reached out to Plaintiff's counsel requesting their position with respect to this request but have not received a response. The requested extension will not affect any other scheduled dates.

Accordingly, we respectfully request that the Court grant Future US a thirty-day extension to respond to the Complaint.

Respectfully submitted,



Madelyn K. White

cc: Joseph A. Dunne, Esq. (via ECF)
counsel for Plaintiff Magnum Photos, Inc.